

REMARKS

This paper is submitted in reply to the Office Action dated August 8, 2007, within the three-month period for response. Reconsideration and allowance of all pending claims are respectfully requested.

In the subject Office Action, claims 1-8, 12-21, and 25-29 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,408,343 to Erickson et al. Additionally, claims 9-11 and 22-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Erickson in view of U.S. Patent No. 5,964,887 to Conseil.

Applicants respectfully traverse the Examiner's rejections to the extent that they are maintained. Applicants have amended claims 1, 15, and 29. Applicants respectfully submit that no new matter is being added by the above amendments, as the amendments are fully supported in the specification, drawings and claims as originally filed. Applicants also note that the amendments made herein are being made only for facilitating expeditious prosecution of the aforementioned claimed subject matter. Applicants are not conceding in this application that the originally-claimed subject matter is not patentable over the art cited by the Examiner, and Applicants respectfully reserve the right to pursue this and other subject matter in one or more continuation and/or divisional patent applications.

Now turning to the art-based rejections, and specifically to the rejection of amended independent claim 1, this claim has now been amended to clarify the that control circuit is configured to assign a correlation token to each of the plurality of access adapters, where each correlation token is for use in connection with accessing an electronic resource via the access adapter to which such correlation token is assigned. In addition, claim 1 has been amended to clarify that the control circuitry is configured to initiate the substitution of the shareable spare adapter for the substituted access adapter by reassigning the correlation token assigned to the substituted access adapter to the shareable spare adapter. Support for these amendments may be found, for example, in paragraphs [0028]-[0032] of the published application.

As such, claim 1 now clarifies that the substitution of a shareable spare adapter for any of a plurality of access adapters is implemented at least in part by reassigning a correlation token previously assigned to the access adapter to be substituted, to the shareable spare adapter. As discussed in paragraphs [0028]-[0029], a correlation token may be used, for example, to enable a host and an access adapter to pair up with one another, so that the host can locate the access adapter across an interconnect fabric and access an electronic resource using that access adapter. Furthermore, a correlation token may also associate an access adapter to particular electronic resources, e.g., Logical Units (LUN's) in a shared resource.

As admitted by the Examiner in connection with the rejection of claims 9-11 and 22-24, Erickson does not disclose the concept of a correlation token. Instead, the Examiner relies on Conseil for allegedly disclosing such a feature at col. 1, lines 46-61. As such, claim 1 is novel over Erickson, and the rejection of claim 1 should be withdrawn.

Claim 1 is also non-obvious over Erickson, as well as over the combination of Erickson and Conseil. Conseil merely discloses “tokens” that are used to indicate whether a particular memory in a redundant system has more current data than another memory in the same system. In this regard, the tokens of Conseil are nothing more than state identifiers, indicating which among two stations contain the most up-to-date data. While these identifiers might be analogized to “tokens;” however, they are not analogous to “correlation tokens”, since the identifiers fail to correlate to anything. Correlation is defined by the American Heritage Dictionary as “[a] causal, complementary, parallel, or reciprocal relationship, especially a structural, functional, or qualitative correspondence between two comparable entities.” As noted above, correlation tokens may be used, for example, to correlate a host to an access adapter and/or to correlate an access adapter to particular electronic resources. The Conseil tokens, on the other hand, do not perform any “correlation” between comparable entities, and as such, they cannot be relied upon to serve as “correlation tokens” within the context of Applicants’ claimed invention.

In addition, claim 1 recites that the substitution of the shareable spare adapter for the substituted access adapter is performed by reassigning the correlation token assigned to

the substituted access adapter to the shareable spare adapter, a concept that is disclosed by neither Erickson nor Conseil. Erickson substitutes one adapter for another adapter by deactivating a SCSI Enclosure Processor (SEP) and disabling a SCSI repeater on one adapter and activating an SEP and enabling a SCSI repeater on another adapter. Erickson, however, does not disclose any value or data structure that is analogous to a correlation token, nor does Erickson disclose any reassignment of any value or data structure that was previously assigned to one adapter to another adapter in order to substitute that other adapter. Likewise, Conseil merely discloses tokens in two redundant stations that are set to “present” or “absent” states depending upon whether the data stored in the respective station is the most recent data (*see*, col. 1, lines 46-61 and col. 2, lines 37-43). Neither of these states, or tokens, is ever “reassigned” to a different station; the states merely identify which station has the most recent data.

Applicant therefore respectfully submits that the proposed combination of Erickson and Conseil does not disclose or suggest each and every feature of claim 1, namely the concept of reassigning a correlation token assigned to one access adapter to a shareable spare adapter in order to substitute the shareable spare adapter for the substituted access adapter. Claim 1 is therefore non-obvious over Erickson and Conseil. Reconsideration and allowance of independent claim 1, and of claims 2-14 which depend therefrom, are therefore respectfully requested.

Next with regard to independent claims 15 and 29, each of these claims has been amended in a similar manner to claim 1, and each now additionally recites the concepts of (1) assigning a correlation token to each of the plurality of access adapters, where each correlation token is for use in connection with accessing the computer resource via the access adapter to which such correlation token is assigned, and (2) using the shareable spare adapter to supplant the interface provided by the first adapter by reassigning the correlation token assigned to the first access adapter to the shareable spare adapter. As discussed above in connection with claim 1, neither Erickson nor Conseil, alone or in combination, discloses or suggests this combination of features. Accordingly, claims 15 and 29 are patentable over the cited references for the same reasons presented above for

claim 1. Reconsideration and allowance of claims 15 and 29, and of claims 16-28 which depend therefrom, are therefore respectfully requested.

As a final matter, Applicants traverse the Examiner's rejections of the dependent claims based upon their dependency on the aforementioned independent claims. Nonetheless, Applicants note that a number of these claims recite additional features that further distinguish these claims from the references cited by the Examiner. However, in the interest of prosecutorial economy, these claims will not be addressed separately herein.

In summary, Applicants respectfully submit that all pending claims are novel and non-obvious over the prior art of record. Reconsideration and allowance of all pending claims are therefore respectfully requested. If the Examiner has any questions regarding the foregoing, or which might otherwise further this case onto allowance, the Examiner may contact the undersigned at (513) 241-2324. Moreover, if any other charges or credits are necessary to complete this communication, please apply them to Deposit Account 23 3000.

Respectfully submitted,

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Date

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